

REMARKS

Claims 1-23 are pending in this application, stand rejected, and are at issue herein. Reconsideration of the grounds of rejection of claims 1-23 and indication of their allowability at an early date in view of the following remarks are respectfully solicited.

The Examiner has rejected claims 1-6 under 35 U.S.C. §102(e) as being anticipated by Bakshi, U.S. Patent No. 6,457,054. The Applicant has thoroughly considered the Examiner's application of the reference, but must respectfully traverse this ground of rejection. Reconsideration of this ground of rejection and indication of the allowability of claims 1-6 at an early date are respectfully solicited.

Independent claim 1 requires, *inter alia*, "establishing a first communication channel between the first processor and the second processor through the proxy server...; and establishing a second communication channel between the first processor and the second processor through the proxy server..." As is clear from this independent claim 1, two separate communication channels must be established between the first processor and the second processor through the proxy server. As such, any system that does not establish two separate communication channels as specified by this independent claim 1 cannot anticipate this claim, or those claims dependent thereon.

The Bakshi '054 reference, however, does not establish two separate communication channels at all. Instead, Bakshi '054 describes a system in which the user-visible latency for communication between two network devices is reduced. This is done by minimizing the three way handshake typically required for HPPT communications. However, only a single communication channel is opened in the system of Bakshi '054. This single channel is clearly illustrated in FIG., 4 of Bakshi '054. A second communication channel is not illustrated in FIG., 4 nor is there any description of the same.

Indeed, the abstract of the Bakshi '054 patent describes, in the singular, "the second network device transmits a response packet to the first network device that includes a confirmation of the request to establish a new connection and a reply to the request for data. A connection between the first and second network devices is maintained after receipt of the

response packet." (emphasis added). Further, the summary of the invention section also describes, in the singular, the establishment of a single communication channel between the client and server at line 19-22 which reads "the request packet includes a request to establish a connection in a request for data, wherein the request to establish a connection includes a connection identifier." (emphasis added). This summary concludes, also with a description in the singular, that "a connection is then maintained between the first and second network devices after receipt of the response packet." Bakshi '054, column 2, lines 28-30 (emphasis added).

In rejecting this independent claim 1, the Examiner cites to a prior art FIG. 1, and to column 2, line 51-column 3, line 30 of Bakshi '054 to meet the limitations of both the first communication channel and the second communication channel. However, FIG. 1 clearly illustrates only the opening of a single client/server TCP exchange for an HTTP transaction. No second communication panel is illustrated between the client and server whatsoever. Furthermore, the cited text beginning at column 2, line 51 merely describes the typical HTTP transaction using TCP and a three-way handshake performed to establish a single connection. Specifically, lines 56-57 states "a three-way handshake is performed to establish a connection (that is, open a socket) between an HTTP client device and server device." (emphasis added). However, Bakshi describes that this typical procedure magnifies the user-visible latency.

This cited text continues in column 3, line 15 to describe an approach to reduce the user-visible latency due to this TCP handshaking. However, this approach known as persistent HTTP or P-HTTP also only opens a single connection. As stated in column 3, line 19-22 "this approach seeks to limit user-visible latency by performing the TCP handshake procedure only once, at the beginning of a data exchange, and then maintain a persistent connection for the duration of the exchange." (emphasis added). As with the previous discussion, this text also identifies only a single connection between the client and server. Bakshi '054 does not describe that the typical HTTP connection and the persistent HTTP connection are both opened, but describes that these are two different techniques, each opening only a single connection.

The Applicant has further studied the remainder of the un-cited description of Bakshi '054 and were unable to find any discussion of a method of bi-directionally communicating that requires the establishment of a first communication channel and a second communication channel as claimed in claim 1. Instead, the system of Bakshi '054 provides a system for reducing

user-visible latency for communicating between two network devices over a single connection between the two devices. Therefore, the Applicant respectfully submits that Bakshi '054 cannot anticipate independent claim 1 because it wholly lacks any teaching or suggestion of the establishment of two communication channels between the first processor and the second processor through the proxy server. Reconsideration of this ground of rejection and indication of the allowability of claim 1 and those claims dependent thereon, to wit claims 2-12, at an early date are respectfully solicited.

In addition to the reasons stated above, claim 2 requires the step of "transmitting a first HTTP-based 'request' to the second processor via the proxy server, the first 'request' including at least one of the first messages therein." To meet his limitation, the Examiner points to the request packet described in the abstract, and to column 1, line 51 to column 2, line 30. However, it is clear from a reading of the abstract that the request packet is simply a request to establish a new connection, and does not include at least one of the first messages to be transmitted on the first communication channel. Instead, this request packet may be selectively accepted or denied by the second network device to establish a new connection therebetween.

As described in the abstract "the second network device selectively accepts the new connection or discards the request based on a comparison of the connection identifier to a corresponding connection identifier that it maintains." Indeed, the abstract goes on to describe that "a connection between the first and second network devices is maintained after receipt of the response packet" that the second network device sends to the first network device. (emphasis added). It is not until the connection has been established that the two network devices can exchange any messages. This is specifically set forth in the summary of the invention section in column 2, line 18 wherein it is stated "the request packet includes a request to establish a connection and a request for data, wherein the request to establish a connection includes a connection identifier." Nowhere in this description does it say that the request includes any of the messages to be exchanged between the client and server. Instead, the request packet of Bakshi '054 merely is a request to establish a connection and a request for data from the server. Once the server accepts the connection, the server then transmits its message to the client over that connection. Therefore, the Applicant respectfully submits that Bakshi '054 cannot anticipate claim 2 for this additional reason.

In addition to the reasons stated above with regard to claim 1, claim 3 requires the step of "transmitting a second HTTP-based 'request' to the second processor via the proxy server to be parked at the second processor, the second 'request' establishing a persistent HTTP connection between the first processor and the second processor through the proxy server." As claimed, only a single request is transmitted from the client to the server via the proxy server to be parked at the second processor. In the system of claim 3, this parked request establishes a persistent HTTP connection between the first processor and the second processor through the proxy server.

In the system of Bakshi '054, the establishment of persistent HTTP connection actually requires "performing the TCP handshake procedure only once, at the beginning of the data exchange, and then maintaining a persistent connection for the duration of the exchange." Bakshi '054, column 3, lines 19-22. As is clearly set forth in this cited section, Bakshi '054 requires that the entire TCP handshake be performed before the beginning of the data exchange and before the persistent connection between the client and server will be maintained. In other words, the "request" from the client is not parked at the server, but instead triggers a three-way TCP handshake procedure that must be completed before the data exchange may begin and before the persistent connection may be maintained. As such, Bakshi '054 does not anticipate this claim 3 for this additional reason. Reconsideration of this ground of rejection and indication of the allowability of claim 3 and those claims dependent thereon, to wit claims 4-11, for this additional reason are respectfully solicited.

In addition to the above, claim 4 requires the step of "receiving an HTTP-based "reply" from the second processor on the second communication channel, the HTTP-based "reply" including at least one of the second messages therein." As just discussed, the persistent HTTP connection described in column 3 cited by the Examiner requires that the entire TCP handshake procedure be performed, albeit only once, at the beginning of the data exchange before the persistent connection can be maintained. As such, there is no description that the HTTP-based "reply" includes any messages to be exchanged from the server to the client. Instead, messages are only exchanged once the TCP handshake procedure has been performed. Therefore, the Applicant respectfully submits that Bakshi '054 cannot anticipate claim 4. Reconsideration of claim 4 for this additional reason and indication of its allowability, and the allowability of claim 5 dependent thereon, for this additional reason are respectfully solicited.

In addition to the above, claim 5 requires the step of "transmitting a third HTTP-based "request" to the second processor via the proxy server in response to receiving the HTTP-based "reply", the third HTTP-based "request" containing an acknowledgement for the HTTP-based "reply" and further establishing a persistent HTTP connection between the first processor and the processor through the proxy server." However, the transmission of such a third HTTP-based request to establish a persistent HTTP connection is contrary to the teachings of Bakshi '054 which describes that the TCP handshake procedure is performed only once, at the beginning of the data exchange, to maintain the persistent connection "for the duration of the exchange." Therefore, the Applicant respectfully submits that Bakshi '054 cannot anticipate claim 5 for this additional reason. Reconsideration of claim 5 and indication of its allowability at an early date are therefore respectfully solicited.

In addition to the above, claim 6 requires that "the first processor only receives an HTTP-based "reply" from the second processor on the second communication channel, when the second processor has at least one of the second messages to send to the first processor." Unlike the requirements of claim 6, the cited sections of Bakshi '054 all describe the transfer of client-requested information. Specifically, Bakshi '054 describes in column 4, line 59-21 "the reply to the request from the client device may include all of the data requested or only a portion of that data, as is known in the art." Similarly, column 5, line 11-14 describes "the client device reuses the same connection to request all the URLs contained in the HTML document returned by the server device..." In response to these requests, the server immediately sends the requested data.

Claim 6, however, requires that the first processor only receive the HTTP-based "reply" from the second processor when the second processor has at least one of the second messages to send to the first processor. If the processor does not have a second message to send, no HTTP-based reply is received. This is contrary to the teachings of Bakshi '054. Therefore, the Applicant respectfully submits that Bakshi '054 cannot anticipate claim 6 for this additional reason. Reconsideration of claim 6 and indication of its allowability at an early date are therefore respectfully solicited.

The Examiner has rejected claims 7-23 under 35 U.S.C. § 103(a) as being unpatentable over Bakshi '054 in view of Boyle et al., U.S. Patent No. 6,119,167. The Applicant has thoroughly considered the Examiner's rationale for combining these references, and the teachings

of these references as so combined, but must respectfully traverse this ground of rejection. Reconsideration of this ground of rejection and indication of the allowability of claims 7-23 in view of the following remarks at an early date are respectfully solicited.

It is axiomatic in the patent law that there must be some suggestion or motivation for modifying or combining the teachings of the prior art, that there must be some reasonable expectation of success from the teachings so combined, and that the combination must teach each and every limitation of the claims. Additionally, it is important to note that a conclusory statement regarding the suggestion or motivation to combine the references is not sufficient to support a *prima facie* case. See *In re Lee*, 61 USPQ2d 1430, 1433.

In this case, the Examiner has stated that Bakshi '054 and Boyle '167 are in the same field of endeavor and in an analogous art, in that the combination of these references would have been obvious "for the purpose of optimizing for the cost and latency parameters." The Applicant respectfully submits that this is a mere conclusory statement that does not have any bearing on providing a suggestion or motivation to one of ordinary skill in the art to combine the teaching of these two references. As such, the applicant respectfully submits that this statement cannot support the proposed combination.

With regard to the optimization for cost, the system of Bakshi '054 does not appear to have any cost component that needs to be optimized since it merely describes a different connection technique for reducing user-visible latency for communications between two network devices. The cost of completing a three-way TCP handshake versus the cost of implementing the single message of Bakshi '054 to establish a persistent connection would not appear to be a component that one of ordinary skill in the art would believe needs to be optimized. That is, the Applicant respectfully submits that there is no appreciable cost associated with the transmission of three network messages to establish an HTTP connection versus the transmission of a single message including a connection identifier of Bakshi '054. Therefore, the Applicant respectfully submits that an optimization for cost cannot support this proposed modification.

Further, the system of Bakshi '054 is already directed to a system for reducing the user-visible latency in a network transaction by reducing the number of packets that must be transmitted to form the HTTP connection. The system of Boyle et al. '167, however, describes

that data is stored on an intermediate computer system for a predetermined length of time until it is able to provide that data to another device such as a wireless handheld device or cell phone. User latency on the scale of Bakshi '054 is not of concern in Boyle et al. '167 because the period between synchronization with the portable handheld device may be extensive while the user is out of range or otherwise unconnected to the intermediate computer system. Indeed, Boyle et al. '167 is not even concerned with the reliable transmission of such messages as the data may be simply deleted and never forwarded to the destination if that data is stored for more than a predetermined length of time. Therefore, it cannot be said that the system of Boyle et al. '167 is concerned with user-visible latency that would result from requiring a three-way TCP handshake. This is because Boyle et al. '167 recognizes that it may have to store messages for some predetermined length of time while a hand held device is not connected before it is able to transmit the data to that device. As such, the Applicant respectfully submits that optimizing for latency also cannot support the combination of these references.

In view of the above, the Applicant respectfully submits that the examiner has failed to establish a *prima facie* case of obviousness as there is no suggestion or motivation for one of ordinary skill in the art that can support such a combination. That is, the system of Boyle et al. '167 will not optimize the cost parameters of Bakshi '054, nor will the system of Bakshi '054 optimize the latency seen in the system of Boyle et al. '167. Reconsideration of this ground of rejection and indication of the allowability of claims 7-23 at an early date are therefore respectfully solicited.

In addition to the foregoing, the applicant also respectfully submits that there is no likelihood of success from a combination of these references. That is, the system of Bakshi '054 is directed to reducing user-visible latency between two network devices. However, the system of Boyle et al. '167 is directed to a data transfer system that transfers data from a web server, through an intermediate computer system, to a portable hand-held device. As described in Boyle et al. '167, the transmission of data from the intermediate computer system to the portable device, e.g. a cell phone, may use a connectionless protocol. Specifically, the system of Bakshi '054 modifies the TCP process for an HTTP data transfer, whereas the Boyle et al. '167 reference utilizes the cellular digital packet data (CDPD) standard, the GSM standard, the UGP connectionless protocol, or the HDTP (hand held device transport protocol), which is not a mark-

up language like HTML. Therefore, the Applicant respectfully submits that a *prima facie* case of obviousness has not been properly established for this reason as well.

Most telling, however, is the lack of these two references when combined to satisfy each and every limitation of the claims of the present invention. As this requirement must be met for each individual claim, the following discussion will address this specific point and the failure of these references when combined to teach each and every limitation of these claims.

Claim 7 requires that "the second HTTP-based "request" includes therein a request that the second processor transmit a reply after the expiration of a time period even if there is no second messages so that the first processor can assess a status of the connection thereto." To meet this limitation the Examiner points to Boyle et al. '167, column 10, line 34-column 11, line 33, and column 11, line 34-column 12, line 15. However, these sections merely describe that the messenger may assign a time to live parameter (MTTL) for each notification received by the messenger. If such a message has been held in the messenger queue longer than the MTTL and the messenger has not been able to send the notification to the respective browser, the messenger deletes the notification from the messenger cue. This time period is completely foreign to the time period of claim 7 which requires that the second processor transmit a replay after the expiration of the time period even if there are no messages to transmit. The system of Boyle '167 teaches exactly the opposite.

In Boyle, if no message has been transmitted after the MTTL, the message is simply deleted and will not thereafter be sent. This is required in Boyle et al. '167 because the portable hand held device may not be connected to the network. As such, no messages could be transmitted thereto. To prevent messages that cannot be sent to an unconnected device from filling up memory, these messages are deleted after a period of time. This system is completely foreign to the requirements of claim 7. Therefore, the Applicant respectfully submits that claim 7 is not rendered obvious by the combination of these references. Reconsideration of claim 7 and those claims dependent thereon, to wit claims 8-11, are respectfully solicited.

Claim 8 requires "setting the time period to be less than two days." The section cited by the Examiner to meet this limitation contains no such description. Indeed, the applicant was unable to find any particular time period for the MTTL, although as stated above with regard to

claim 7, the MTTL does not meet the limitation of the time period of claim 7. However, the last sentence of Appendix 1 states "if time-to-live has not been specified, the time-to-live 28 (FIG. 2) is set to a default value (3 days in some embodiments)." In view of this specified teaching of a three day default period, the Applicant respectfully submits that the requirement of claim 8 that the time period be less than two days is not taught or suggested by this combination of references. Therefore, the Applicant respectfully submits that claim 8 is not rendered obvious by this combination for this additional reason. Reconsideration of claim 8 and indication of its allowability at an early date are respectfully solicited.

Claim 9 requires "setting the time period to be approximately 5 minutes." As discussed above, the only discussion in Boyle '167 of a time period is a default value of three days. As such, the Applicant respectfully submits that the setting of a time period to five minutes is not taught or suggested by this combination of references. Therefore reconsideration of this ground of rejection and indication of the allowability of claim 9 for this additional reason are respectfully solicited.

Claim 10 requires "dynamically adjusting the time period based on a connection time out closure controlled by the proxy server." The Applicant respectfully submits that Boyle et al. '167 is completely devoid of any such description or suggestion. That is, neither the sections cited by the Examiner nor the remainder of the disclosure of Boyle et al. '167 teaches or suggests dynamically adjusting the time period based upon a connection time out closure controlled by the proxy sever. Therefore, the Applicant respectfully submits that claim 10 is not rendered obvious by this combination of references. Reconsideration of this ground of rejection and indication of the allowability of claim 10 at an early date are therefore respectfully solicited.

Additionally, claim 11 requires that the dynamic adjusting of a time period comprises "receiving a connection time out closure message from the proxy server; determine a first time between transmitting the second HTTP-based request and receiving a connection time out closure message from the proxy server; and calculating a new time period to be less than the first time and less than the time period." The applicant has thoroughly studied the section cited by the Examiner, and respectfully submits that the cited sections do not each the receipt of a time out closure message, a determination of a further time between transmission and receipt, nor the calculation of a new time period that is less than the first time and less than the time period.

Therefore, the Applicant respectfully submits that claim 11 cannot be rendered obvious in view of this combination of references for this additional reason. Reconsideration of this ground of rejection and indication of the allowability of claim 11 at an early date are respectfully solicited.

Independent claim 12 claims "a computer-readable medium having computer-readable instructions for performing the method of claim 1." In rejecting this claim under 35 U.S.C. §103(a) over Bakshi '054 in view of Doyle et al. '167 the Examiner has merely stated that this claim is "rejected under the same rationale as claim number 1. However, claim 1 was not rejected under 35 U.S. C. §103(a) in view of this combination of references. Therefore, the Applicant is unclear as to the ground of rejection being set forth by the Examiner since paragraph 13 of this Office Action includes claim 12 and the rejection based on 35 U.S.C. §103(a). Therefore, should the Examiner decide to maintain this ground of rejection, the Applicant respectfully requests clarification thereof. However, the Applicant respectfully traverses this ground of rejection for the reasons stated above with regard to claim 1.

Independent claim 13 requires "transmitting an HTTP-based request to the server via the proxy server to open a persistent connection therewith, HPPT-based request requesting a reply from the server only when the server has messages to send the client." To meet this limitation the examiner cites to column 11, line 65-column 12, line 10 of Boyle et al. '167. However, in this cited section, several alternatives are provided for how the user may request mail service. None of the recited alternatives teach or suggest that an HTTP-based "request" requests a reply from the server only when the server has messages to send to the client. While this cited section does end with the statement "this is not an exhaustive list of how the user may control the push operation to optimize the cost and latency parameters" such an open-ended, nebulous statement is not sufficient to provide a teaching of the special requirements of independent claim 13. That is, a reference that leaves to the imagination all possibilities cannot provide a teaching or suggestion of the specific requirements of this claim.

Further, the delivering of mail does not address the preliminary establishment of the HTTP connection itself. That is, in the system as claimed in independent claim 13, the server is not to send an HTTP –based reply in response to the HTTP-based request as is the typical scenario in forming an HTTP connection. Instead, the server is directed not to send an HTTP-based reply in response to the HTTP-based request until and unless the server actually has a

message to send to the client. In the system of Boyle et al. '167, however, a full persistent connection has already been established before the cited section discussing mail delivery can take place. In other words, it appears that the system of Bole et al. '167 has completed the three-way handshake to establish a persistent HTTP connection before the mail forwarding rules are implemented. As such, the Applicant respectfully submits that independent claim 13 cannot be rendered obvious in view of this combination of references. Reconsideration of this ground of rejection and indication of the allowability of independent claim 13 and those claims dependent thereon, to wit claims 14-19, are respectfully solicited.

The Examiner has rejected claim 14 under the same rationale as claim 7. Therefore, the Applicant respectfully traverses this ground of rejection for the additional reasons set forth above with regard to claim 7.

The Examiner has rejected claim 15 under the same rationale as claim 10. Therefore, the Applicant respectfully traverses this ground of rejection for the additional reasons set forth above with regard to claim 10.

The Examiner has rejected claim 16 under the same rationale as claim 11. Therefore, the Applicant respectfully traverses this ground of rejection for the additional reasons set forth above with regard to claim 11.

The Examiner has rejected claim 17 under the same rationale as claim 11, 3, and 7. Therefore, the Applicant respectfully traverses this ground of rejection for the additional reasons set forth above with regard to claim 11, 3, and 7.

The Examiner has rejected claim 18 under the same rationale as claim 11 and 5. Therefore, the Applicant respectfully traverses this ground of rejection for the additional reasons set forth above with regard to claim 11 and 5.

The Examiner has rejected claim 19 under the same rationale as claim 13. Therefore, the Applicant respectfully traverses this ground of rejection for the additional reasons set forth above with regard to claim 13.

Independent claim 20 requires the steps of "receiving and HTTP-based request originating from the client through the proxy server; and parking the HTTP-based request without responding thereto unless the message is generated that needs to be transmitted to the client; and when the message is generated generating an HTTP-based reply to the HTTP-based request parked for the client, the HTTP-based reply containing the message therein; and transmitting the HTTP-based reply." However, neither of these references taken alone or in combination teaches the step of parking the HTTP-based request without responding thereto unless a message is generated that needs to be transmitted to the client. Specifically, each of the references cited by the Examiner will fully complete the establishment of a persistent HTTP connection between the client and server. Neither of the references describes the parking of an HTTP-based request.

The Examiner has pointed to the alert or notification messages of Boyle et al. '167. However, it is clear that both the alert and notification messages are generated after the HTTP connection has been established. The Examiner has pointed to no specific section of either of these references, and the Applicant was unable to find any description of the parking of an HTTP-based request without responding until a message is generated that needs to be transmitted to the client.

Further, the Applicant was unable to find, and the Examiner pointed to no section that specifically described that the HTTP-based reply to the HTTP-based request parked for the client contains the message to be transmitted thereto. In view of the above, the applicant respectfully submits that claim 20 is not rendered obvious by this combination of references. Reconsideration of this ground of rejection and indication of the allowability of claim 20 and those claims dependent thereon to wit claims 21-23, at an early date are respectfully solicited.

Claim 21 also requires the step of "receiving a second HTTP-based request containing a message acknowledgement from the client through the proxy server; parking the second HTTP-based request." To meet this limitation, the Examiner points to Boyle et al. '167, FIG. 32, arrow HOLD ON. However, the Boyle et al.'167 patent describes in Appendix A1, Section 1.1.5 that the arrow indicated as HOLD ON is actually a "request acknowledgement...sent by the UP Gateway to the client to inform it that the request has arrived successfully and any further retransmission is unnecessary." Boyle et al. '167, column 24, lines 23-29.

In other words, receipt of an HTTP-based request will not be parked, but instead will generate the transmission of a HOLD ON acknowledgement. However, as described in the specification of the instant application, page 17, beginning at line 16 and continuing through page 18, line 12, the server parks the HTTP request instead of sending any acknowledgement or reply to keep the second communication channel open so the server may then send a message to the client when such becomes available. As should be apparent, this parking functionality is completely foreign to the system of Boyle et al. 167 which, instead, generates an acknowledgement message referred to therein as the arrow HOLD ON. Therefore, the Applicant respectfully submits that claim 21 cannot be rendered obvious by this combination of references for this additional reason. Reconsideration of this ground of rejection and indication of the allowability of claim 21 at an early date are respectfully solicited.

Claim 22 requires that the step of parking the HTTP-based request comprises "parking the HTTP-based request without responding thereto until the expiration of the connection of the time out period; and when the connection time out period expires generating an HTTP-based reply to the HTTP-based request parked for the client and transmitting the HTTP-based reply. As discussed above, Boyle et al. '167 is wholly devoid of any parking functionality that results in the server withholding a response. Further, Boyle fails to teach that the expiration of the time out period results in the generation of an HTTP-based reply to the parked request. Instead, at the expiration of the time period discussed in Boyle et al. '167, messages held in the queue that have not been delivered are simply deleted. The Examiner did not specifically identify and the Applicant was unable to find any discussion in Boyle et al. '167 that described the generation of a HTTP-based reply and its transmission after a time out period had expired. As such, the Applicant respectfully submits that claim 22 is not rendered obvious over this combination of references for this additional reason. Therefore, reconsideration of this ground of rejection and indication of the allowability of claim 22 at an early date are respectfully solicited.

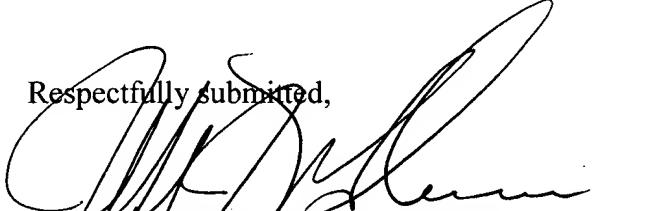
The Examiner has rejected claim 23 under the same rationale as claim 20. Therefore, the Applicant respectfully traverses this ground of rejection for the same reason stated above with regard to claim 20.

In re Appln. Of: Shy Cohen
Application No.: 09/676,924

In view of the above, the Applicant respectfully submits that claims 1-23 are in condition for allowance. Reconsideration of claims 1-23 in view of the foregoing remarks and indication of their allowability at an early date are respectfully solicited.

If the Examiner believes that a telephonic conversation will aid in the resolution of any issues not resolved herein, the Examiner is invited to contact the Applicant's attorney at the telephone number listed below.

Respectfully submitted,



Jeffrey P. Makeever, Reg. No. 37390
LEV DIG, VOIT & MAYER, LTD.
6815 Weaver Road, Suite 300
Rockford, Illinois 61114-8018
(815) 963-7661 (telephone)
(815) 963-7664 (facsimile)

Date: October 12, 2004